

ALBERT Y. DAYAN

80-02 Kew Gardens Rd., # 902, Kew Gardens, N.Y. 11415

Attorney at Law

Tel: (718) 268-9400:

Fax: (718) 268-9404

March 17, 2017

The Honorable Stanley R. Chesler
United States District Judge for the
District of New Jersey
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: United States v. Ahmed El Soury
Criminal No.: 16-562 (SRC)

Dear Judge Chesler:

This letter is respectfully submitted on the subject and to the Government's letter of March 16, 2017.

The defendant, Ahmed El Soury was indicted on December 13, 2016. Defense Counsel's first appearance was on December 20, 2016, for his arraignment. It is only three months since my appearance. As explained in my letter of March 16, 2017, I really need additional time for the preparation and trial of this case. For the past two months, I was engaged in the preparation of other trial matters in Federal and State Courts as well as visiting defendants who are in custody.

Your Honor, as a matter of fact, I know of a related new case that the Government just tried that was pending on the calendar between indictment and trial for almost one and a half years. In this case, I am currently reviewing the numerous discovery, preparing for trial, researching and drafting a motion that has up to now addressed two significant due process issues and I am handling this all on my own. I can most probably finish the motion by March 23, 2017, but I respectfully request that Your Honor kindly reset the trial to any date in June 2017.

Thank you Your Honor.

Respectfully submitted,

/s/ Albert Y. Dayan
Albert Y. Dayan
Attorney at Law